

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

<b>IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION</b>	<b>MDL No. 2875</b>
<b>THIS DOCUMENT RELATES TO ALL CASES</b>	<b>HON. ROBERT B. KUGLER</b>

**NOTICE TO TAKE VIDEOTAPED ORAL DEPOSITION**

**TO: Seth Goldberg, Esq.  
DUANE MORRIS  
30 S. 17<sup>th</sup> Street  
Philadelphia, PA 19103**

*Attorneys for Defendants*

Please take notice that pursuant to Federal Rule of Civil Procedure 30, and other applicable Rules, including the Local Civil Rules, and the applicable Orders of the Court, Plaintiffs, by and through their counsel, will take the videotaped deposition via Zoom, of **Dr. Lauren J. Stiroh**, on March 25, 2022, at 9:00 a.m. eastern time, and continuing until completion, at Duane Morris, 1540 Broadway, New York, NY 10036, in accordance with the Fact Witness Deposition Protocol, Case Management Order #20, filed November 17, 2020 (Document 632). The witness shall produce the documents requested at Exhibit A, attached hereto, at least two days in advance of the deposition, to the extent not already served upon Plaintiffs.

**TAKING ATTORNEY FOR PLAINTIFFS:**

Ruben Honik  
**HONIK LLC**  
1515 Market Street  
Suite 1100  
Philadelphia, PA 19102  
[ruben@honiklaw.com](mailto:ruben@honiklaw.com)

The videotaped deposition will be taken via Zoom before a person authorized by law to administer oaths, pursuant to Rule 28 of the Federal Rules of Civil Procedure.

March 10, 2022

**PLAINTIFFS' PEC COUNSEL**

By: /s/ Ruben Honik  
**HONIK LLC**  
1515 Market Street  
Suite 1100  
Philadelphia, PA 19102  
(215) 278-4449  
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**EXHIBIT A**

**DOCUMENT REQUESTS**

1. Copies of all invoices for work performed in connection with any consultation or expert work performed for or on behalf of any defendant or their counsel with regard to any issues in this MDL, including but not limited to for the review of documents, review and consultation with regard to plaintiff experts, preparation of Dr. Stiroh's report, and preparation for deposition or trial.
2. All communications between Dr. Stiroh and employees of the NERA Economic Consulting (referenced in Paragraph 1 of Dr. Stiroh's Report).
3. All Documents reflecting any work done by the NERA Economic Consulting for or at the direction of Dr. Stiroh, including but not limited to all invoices submitted by the NERA Economic Consulting to Dr. Stiroh or to Defendants in this litigation.
4. Any notes, i.e., written or electronic, reflecting consulting or litigation work that has not been documented in invoices.
5. Any articles, presentations, seminars, classes, or other similar documents (including PowerPoint-type slides) authored by Dr. Stiroh regarding any aspect of healthcare decisionmaking.
6. Copies of any documents or articles relied upon or considered for the opinions set forth in the report served.
7. Copies of all notes, annotations, or highlights of transcripts of any testimony reviewed by or on behalf of Dr. Stiroh considered for Dr. Stiroh's Report;
8. Copies of any documents or articles reviewed in connection with the report served, whether or not listed in the report or attachments thereto.
9. Copies of all Publications and Presentations listed in Dr. Stiroh's CV, which is Exhibit A to her Expert Report.
10. Any illustrations, PowerPoints, images, charts, tables or demonstrative exhibits that may be used by or with Dr. Stiroh in connection with a Daubert hearing or trial testimony in this litigation.
11. Documentation of any prior work Dr. Stiroh has done as a consultant for any of the Defendants in this action.
12. Any documents or other communications the witness has received from any person or entity with regard to nitrosamine impurities in any angiotensin II receptor blocker or other drug, outside of information provided by counsel who retained the witness.

13. Any communications from the witness to any person or entity with regard to nitrosamine impurities in any angiotensin II receptor blocker or other drug, outside of communications to counsel who retained the witness.
14. Any textbook referenced by the witness in forming her opinions.
15. Copies of all transcripts of testimony under oath given by Dr. Stiroh in the last 10 years.

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 10, 2022, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

PLAINTIFFS' PEC COUNSEL

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